



**IMACC Corporation
3527 Mt. Diablo Blvd
Box #410
Lafayette, Ca 94549**

July 8, 2015

Sabrina Nelson Deal
City of Portland Projects Plan Review
1900 SW 4th Avenue
Portland, OR 97201

Subject: 3000 NW St Helens Road – Stormwater Source Control
Preliminary Permit Review

Dear Mrs. Deal,

IMACC is about to preparing a working draft remedial design addressing stormwater source control improvements at 3000 NW St Helens Road (the "Site"). These stormwater improvements will likely include paving certain portions of our property and relocating stormwater catch basins and piping.

To facilitate the proposed schedule for implementing these stormwater improvements, IMACC would like to initiate preliminary permit review with the City of Portland as soon as possible. Accordingly, we are requesting to meet with the relevant people from the City's Bureau of Environmental Services and potentially the Bureau of Transportation within the next three weeks.

Background and Suggested Agenda

IMACC Corporation is owner of the real property located at 3000 NW St Helens Road. Container Management Services LLC is our tenant and has operated a drum reconditioning facility at the Site since October 2007. The drum reconditioning operations were first started in 1939 by Reimann and McKinney.

The site has a mix of paved and unpaved portions of the operating area and in order to better control stormwater runoff, IMACC is contemplating paving a significant portion of the unpaved areas of the Site. We have engaged a consultant to prepare source control plans and engineering drawings, which, if approved, will result in the following:

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1. Asphalt paving of three separate storage yards (Front Yard, Soule Yard and the SW-8 Yard) on the Site;
2. At least one railroad crossing to access the SW-8 Yard;
3. Excavation of soil in two locations in the SW-8 Yard;
4. Installation of new catch basins in each of the newly paved areas, which will connect to the City's municipal stormwater system (see attached figure); and
5. Abandonment, in place, of the existing stormwater "drum" pipeline that crosses the Front Yard and conveys stormwater from St. Helens Road and other off-site properties as part of the municipal stormwater conveyance system.

The attached figure is a useful orientation to the Site.

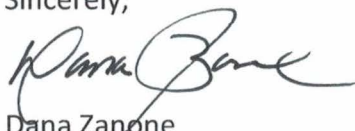
The goal of IMACC's plans for this source control project is to improve stormwater discharge quality leaving the Site. We anticipate that this project will involve the following permitting and/or other approvals from the City and other entities:

- Grading and building permits and plan approvals for asphalt capping, catch basin installations and stormwater improvements in the three drum storage yards.
- An understanding from the City about how it plans to address stormwater runoff from St. Helens Road and upstream properties that currently flows through the "drum" pipeline that will be abandoned.
- Agreement with BNSF regarding improvements to the current railroad crossing that allows access to the SW-8 Yard.

We would appreciate your assistance in contacting the appropriate departments within the City to schedule a meeting to discuss IMACC's plans.

If you have any specific questions about our proposed plans, please do not hesitate to contact me at (510) 719-0154.

Sincerely,



Dana Zanone
Project Manager

